Regarding the following document, I submit comments per Section XII of that document.

DEPARTMENT OF TRANSPORTATION
National Highway Traffic Safety Administration
49 CFR Parts 567, 571, 574 and 575
Docket No. NHTSA-01-11157
RIN 2127-AI32
Tire Safety Information

I will comment specifically on issues as requested in Section VII. Web site links record my opinions on issues related to the recent recalls.

A. about maximum load standards:

"1) 49 U.S.C. 30123 states: "(c) Maximum load standards. The Secretary shall require a motor vehicle to be equipped with tires that meet maximum load standards when the vehicle is loaded with a reasonable amount of luggage and the total number of passengers the vehicle is designed to carry." Should NHTSA define or specify what a "reasonable amount of luggage" is for a vehicle with an occupant in every designated seating position? The agency requests comments on this question. Please be specific in your response and provide a basis for your answer."

Your definitions and specifications do not go deep enough. Vehicle manufacturers should describe a few realistic loading situations with each vehicle, with the effect noted at each wheel location. Current owner's manuals make a few stabs at defining GVWR and GAWR. Generally, tires are seemingly adequate to handle loads at GAWR with some reserve, but individual wheel loading can exceed a tire's capacity while the axle load remains within limits. This may be especially important when a gravitationally challenged (overweight) person occupies a seat position close to one of the wheels. Vehicles with higher centers of gravity are more likely to have individual wheel overloads, as one cannot predict weight distribution shifts. Please refer to this site for an example with a Ford Explorer:
http://www.dreamwater.org/heyyou/fs/weighit.html

B. about TIN locations

"3) Most commenters agree that adding additional required information to the tire sidewall is unwarranted or challenging due to space and readability concerns. Additionally, some commenters have indicated that certain information added at the option of the manufacturer, e.g., warranty information, is not useful to consumers. Based on these sentiments, should the agency consider prohibiting some or all non-required information from being labeled on the tire sidewalls? Please be specific in your response and provide a basis for your answer."

(from VI.A.) "NHTSA proposes that the TIN, size designation, maximum permissible inflation pressure, and maximum load rating be placed on both sides of light vehicle tires. Requiring the TIN and size designation to be on both sides would ensure that that information would be on the sidewall facing outward, regardless of how the tire is mounted. Requiring that the other items of information be on both sidewalls would aid consumers in properly maintaining their tires and loading their vehicles."

First, your proposals evidently aim at making consumers more aware of tire information. I propose that consumers become more responsible for knowing how to maintain their tires. Your studies indicate that consumers currently have little understanding of tire information. Regardless of how much more information you deem necessary, that will not increase consumer awareness, nor will it encourage consumers to maintain their tires. I'm sure President Bush can explain the old Texas saying "You can buy 'em books, but you can't make 'em read." I have found that attempts to develop fool-proof systems (as you seem to be attempting) result in the evolution of better fools. Those evolved ones will find a way around your fool-proofing. While you attempt to stifle Darwinian selection, it will continue – and I don't see why people should not be responsible for their own action or inaction. It's unfortunate that innocent people who are in their way will suffer. The only way I see to increase awareness is a really hard-hitting explanation that they will be liable and subject to criminal charges if they ignore their responsibilities.

Secondly, if your proposals cost money to implement, this becomes another unfunded government mandate. The proposal to have the Tire Identification Number (TIN) on both sides of a tire is especially disturbing. You address some possible complications, mainly concerning the danger to workers in the tire factory. There may be costs which you seriously under-estimate. And the effect of having the TIN on both sides is more one of convenience rather than anything truly beneficial. I suggest rather a simple record system similar to this example: http://www.dreamwater.org/heyyou/fs/tireformat.html

A vehicle manufacture would record and certify the proper data as the tires are installed on each vehicle. The datasheet may be part of the owner's manual or a separate document that must be packaged with the owner's manual. Individual car dealers should also assure that the datasheet is present, even to the point of including it on a mandatory checksheet to be signed and presented to a car buyer.

The datasheet then becomes a record of the vehicle owner's responsibility to maintain the tires and the vehicle. Owner's manuals will have to include some strong language about the owner's responsibilities. Any time new tires are installed on a vehicle, the tire store will have to fill out a new datasheet, including all the same information.

C. about speed ratings and temperature resistance ratings (this was not particularly requested but I find it disturbing)

"V.C.3. **e. Speed Rating**

- Generally, commenters, as a group, believed that a tire's speed rating is important, although not necessarily intuitive, to consumers and should be required to be indicated on the tire. Commenters agreed that consumers should be helped to understand, through consumer education, that they should purchase replacement tires of an equal or greater speed rating to those issued as original equipment. One consumer group commenter suggested that maximum speed limitations should be noted on the sidewall as "speed capacity" rather than "maximum speed" and that UTQG temperature grades could be eliminated since they are redundant with the "speed capacity" information."

A very basic question about speed ratings is "what exactly does a speed rating represent?" If I have tires with the "H" speed rating, does that mean those tires will run all day at 125 to 130 miles per hour on a track in Las Vegas at 110 degrees Fahrenheit? If that same tire's temperature resistance rating is "B", will the tire melt at over 100 mph? What is the relationship between the speed rating and temperature resistance?

More disturbing is the lack of definition of the temperature resistance ratings. General statements abound, but I found three that delve a little deeper but differ significantly, as shown in this page: http://www.dreamwater.org/heyyou/fs/tireinfo.html

I sent an e-mail to the webmaster at NHTSA on December 10, 2001.
"I've seen three different scenarios for rating the temperature resistance of tires (A, B, or C).
The scenarios differ in:
a) whether the test starts with a tire running at 50 mph or 75 mph for 30 minutes.
b) minimum performance requirement -- two say a tire must run at 85 mph for 30 minutes, another says less than 100 mph for 30 minutes to get the "C" rating.
c) maximum performance -- one says 114 mph, another 115 mph, and the third says 130 mph for 30 minutes to earn the "A" temp resistance rating.

Can you provide me with the information or a reference where I may learn the true protocol(s)?"

I haven't had a response yet (December 27), although the NHTSA web site claims 3 to 5 working days for an answer.

I propose that temperature resistance ratings should be upgraded, and that speed ratings should be more thoroughly defined and explained. In addition, some measure of endurance should be attached to speed ratings. If no better proposal is available, I suggest that the speed rating and the temperature resistance rating be combined – that is, if a tire has an "H" speed rating indicating it will run at 130 mph, it should also survive temperature resistance testing for 30 minutes at 130 mph. This can be easily explained, I believe.

To summarize, I see your proposals increasing costs with very little benefit and no effect on consumer behavior. Neither you nor any consumer advocacy organization nor any trial lawyer will have an effect on consumers until such time as you realize that consumers have an obligation to use products correctly and the responsibility for their own safety. Consumers cannot be passive. You will find that responsibility confers awareness in ways that your proposals cannot. But consumer responsibility is not included in any of your proposals. How then do your proposals serve any good?